

Congress of the United States
Washington, DC 20515

December 11, 2019

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington D.C. 20460

Dear Administrator Wheeler:

We are writing to express our continued concerns with the recent closure of the Environmental Protection Agency (EPA)'s Large Lakes Research Station (LLRS) Grosse Ile Office and the relocation of EPA staff to a portafab unit within the Ann Arbor National Vehicle and Fuel Emissions Laboratory. After meeting recently with AFGE EPA representatives, we would like to pass on important data collected and request answers to the questions below.

EPA relocated staff from EPA's Superfund Division, including On-Scene Coordinators (OSCs) who provide rapid responses to environmental emergencies involving uncontrolled releases of hazardous and toxic substances, Special Agents of EPA Criminal Investigation Division, and the only Great Lakes National Program Office field location in the Great Lakes and within a Great Lakes Area of Concern. We have now learned that the Ann Arbor portafab office is proving to be an unsafe and unsatisfactory location for those EPA staff, and that the facts upon which EPA made the decision to move the office was mission-flawed and wasteful of taxpayer dollars.

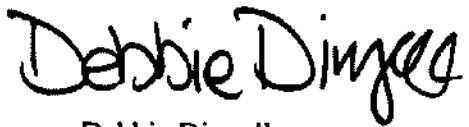
We believe that EPA offices must be sited and organized in a way that protects our health and the environment, and the EPA workers that work in them. It is clear that in EPA's recent relocation to Ann Arbor, the Agency has fallen far short of those goals.

First, the LLRS was a crucial emergency response asset to Wayne County and the metro Detroit area, which has the greatest need for environmental protection in the State of Michigan—39 percent of time critical removals occur within 25 miles of Grosse Ile. Only 9 percent occur that close to Ann Arbor. After the decision was made to close Grosse Ile, but before the new location was selected, EPA developed and submitted a Purchase Order Request (POR) outlining the mission requirements for any new office that might be selected by the Agency (see attached).

The process envisioned the selection of a location within seven miles of Grosse Ile, the original office location. That process was canceled. Ann Arbor, which did not meet the requirements (42 miles away) was chosen. The EPA Office of Criminal Enforcement, Forensics, and Training Detroit Resident Office which needed quick access to the United States Attorney and the Federal Criminal Courts Building in downtown Detroit, now must travel many miles out of its way for court dates and attorney consultations. The EPA Superfund Division's mission, to provide quick responses to environmental emergencies involving uncontrolled releases of hazardous and toxic substances or oil into the environment, has already been compromised because the rapid

EPA workers dedicate their lives to the Agency's mission: "to protect human health and environment." The decision to move EPA employees from LLRS to Ann Arbor endangers that mission and every dedicated EPA employee's ability to do their job. The Agency must take immediate and meaningful steps to address intolerable working conditions and to provide the people of southeast Michigan, who are overburdened with exposure to environmental toxins, with the protection of their health and the environment that they deserve as taxpayers and citizens.

Sincerely,

A handwritten signature in black ink that reads "Debbie Dingell". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Debbie Dingell
Member of Congress

A handwritten signature in black ink that reads "Rashida Tlaib". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Rashida Tlaib
Member of Congress

to agency space consolidation efforts. We have attached a specification package outlining our special build out requirements for the secure climate controlled office and warehouse space.

EPA Region 5 Superfund and OCEFT SPACE REQUIREMENT

The safety and security of the EPA employees is of paramount concern. EPA’s preference is to locate its office in a strategic location for quick deployment and response in the event of an environmental or biological crisis situation. This may require location outside of the Central Business District (CBD), if the CBD does not allow quick access to a major thoroughfare.

While it is recognized that the below listed security specifications and special requirements exceed the “normal level of protection” afforded most other federal facilities, it is necessary they be implemented in order to achieve the same levels of effectiveness and efficiency that are required of all other law enforcement agencies.

The EPA offices must be accessible during normal business hours 7:00am – 7:00pm, M-F, and 24/7 access to the building via card key access is required for Law Enforcement Operations. Two separate EPA offices will be housed at this location and must be separated by a demising wall. The front entry for the OCEFT Law Enforcement space entrance shall be bulletproof, and entrance via a high security deadbolt and cipher lock keypad entry to allow for 24/7 controlled access. No card readers shall be installed on the OCEFT space. Push button intercom with high security door release at the main entrance. The entire space shall be protected by a government furnished Intrusion Detection System with internal CCTV at office entrances.

Twelve secured outside fenced (adjacent to office building) parking spaces, and three inside attached garage spaces is required for government owned or leased law enforcement vehicles. Access to the parking area shall be secured, lighted, and accessible at all times (24-hours per day). 12 spaces for visitor parking will be required plus employee parking.

The EPA OCEFT office suite requires four private offices, security closet, conference/interview room, mail/copy room, and secured storage protected by slab to slab walls with expanded steel mesh inside the walls. Two strand Cat 6 cable to approximately 12 data outlets wired to a patch5 panel in the security closet are required for plug and play line flexibility. OCEFT requests shared access to an EPA R5 break room, kitchen facilities, and shower facilities.

Summary Space Needs

DESCRIPTION	SPACE	NUMBER OF STAFF	CIRCULATION/NOTES
OCEFT Office Space	750 SF		150 SF Circulation
R5 Office Space	2513 SF		453 SF Circulation
Emergency Ops Center	610 SF	10 COOP	110 SF Circulation
OCEFT LEO Space	750 SF		150 SF Circulation
Office Space Subtotal	4623 SF	17 FTE & 4 TW	
Warehouse/Industrial Space	1120 SF		
Parking	13		Secure Fenced Parking Required
Total SF	5743 SF		

5.	Copier/Mail Equipment	150 SF	Copier room must be adjacent to the Secured Rooms for easy document access. Exhaust to exterior. Equipped with (3) data outlets for mail equipment, shared printer, phone, and fax/copier.	
6.	Secured Storage Room	150 SF	The secure storage room walls are to be constructed of slab-to-slab drywall with 13 gauge expanded steel mesh installed on the inside of the walls. Wall opening in the expanded steel whose area exceeds 100 square inches must be protected by hardened steel bars (three-eighths diameter 600 Brunel rating) six inches apart vertically and horizontally welded or mounted in concrete. A steel door in a metal frame will be installed on door(s). High Security deadbolt and cipher style locks will be installed on each door.	
7.	Evidence and Grand Jury Storage Room	150 SF	The evidence and grand jury room walls are to be constructed same as secured storage room above.	
	Subtotal	1200		
	Circulation (+25%)	300		
	Total Space Requirement	1500	For FTE this would equate to 150/FTE	Small office & law enforcement requirement may not comply with agency approved allotment target of 170 USF / FTE. Figures do not include building CF.
	Secured Outside Parking	4	Special Space: Law Enforcement Special Space removed from calculation.	

The EPA Region 5 office suite requires 13 semi private offices, an Emergency Operations & Conference Center, general storage, mail/copy room, and climate controlled space protected by slab to slab walls. Two strand Cat 6 cable to approximately 30 data outlets wired to a patch5 panel in the telecom closet are required for plug and play line flexibility.

The EPA Region 5 Office requires climate controlled warehouse space to accommodate special requirements of EPA Region 5 Superfund team at this location. This team will store a variety of temperature sensitive equipment and materials, including but not limited to field screening equipment, chemical threat agent detection and radiological detection equipment, decontamination equipment, personnel protective equipment and supplies, a government van, government box truck (medium response vehicle).

Region 5 requires a secured warehouse storage facility with:

- climate control, sufficient space to accommodate tactical equipment transport vehicles during loading and unloading;
- water, waste, and power capacity to allow for calibration, maintenance, and decontamination of equipment and personnel;
- capacity for Comcast computer links, telephone, and fax;
- secure vehicle storage/parking for government owned vehicles.

Region 5 Itemized Space Needs

	DESCRIPTION	SPACE	DETAILS	ADDITIONAL INFO
1.	Branch Chief Office	120 SF	1 private office 10' x 12', max 150 SF	Office(s) or workstations to have a door and side relight as well as an upper relite when an interior office is across from a window office.
	Section Chief Office	120 SF	1 private office 10' x 12', max 150 SF	

11.	Climate Controlled Garage Storage. No circulation.	800 SF	Heated storage for Sprinter (passenger van), trailer with Mule (all-terrain vehicle), and responder on-call vehicle. Approximate size 20' x 40'
12.	Secured Outside Parking	10	Parking for ten government vehicles and HAZCAT trailer.
	Subtotal	4800	
	Circulation (+22%)		
	Total Space Requirement	3400 SF 1400 SF	Office Warehouse
	Parking(Reserved and Secured)	10	

1. **ARRANGEMENT OF SPACE**

The office and garage area should be located on the ground floor of the building. No public access to the space during or after hours. Only authorized EPA OCEFT personnel shall have access to the space. EPA authorized personnel shall have access to the office space and parking on a 24 hour basis. The space shall be partitioned following an approved space plan to be furnished by OCEFT Facilities.

2. **PARKING (Government Owned Vehicles)**

Thirteen secured outside fenced (adjacent to office building) parking spaces, and two inside attached garage spaces is required for government owned or leased law enforcement vehicles. Access to the parking area shall be secured, lighted, and accessible at all times (24-hours per day). Parking area must be equipped with a manual or electrical operated lock. A 10 foot minimum ceiling clearance and a 14' minimum garage length is required. One electrical outlet located adjacent to the outside parking area is required.

3. **DAYTIME OFFICE CLEANING**

Cleaning must be done during working hours.

4. **PERIMETER WALLS**

All perimeter walls are to be constructed with drywall from true floor to true ceiling (slab-to-slab). If air plenum openings are required, these openings are to be covered with 13 gauge expanded steel mesh which is firmly anchored to the wall stubs on the inside of the secured area, or hardened Steel bars may be welded to the metal ductwork. The area of any single opening shall not exceed 100 square inches.

5. **PERIMETER DOORS**

In addition to the garage entry door, there will be at least one additional perimeter door. An adequate means of an exit in case of an emergency must be available; therefore, the number of doors should not fall below that prescribed by local fire regulations or building codes.

6. **PERIMETER ENTRANCE DOORS AND DOORS TO SECURED STORAGE**

9. EMERGENCY/FIRE EXITS

Emergency/Fire Exits shall be equipped with panic bars and a quick-release long-throw dead bolt locks. These doors must be alarmed. Hinges shall meet the requirements outlined above for perimeter entrance doors.

10. TELEPHONE AND SECURITY SYSTEM EQUIPMENT

This room is used to house common equipment required to support both voice and data connectivity to workstations, and alarm and access control panels where appropriate. This room may also house the Enforcement Communications System and/or State/Local enforcement government systems. Equipment rooms are typically centrally located, and adhere to TIA/EIA specifications for cable lobe lengths (e.g., maximum cable from closet to workstation will not exceed 90 meters, end-to-end).

The following may be required:

- (a) The room should be dust free with positive air pressure where possible and meet EPA's guidelines for specified material to reduce airborne contaminants caused by off gassing.
- (b) A minimum of 3 separate dedicated 120 V @ 20 amp quad electrical outlets installed for common equipment. Outlets should be installed at heights that adhere to building electrical codes, typically 18" above finished floor. Additional circuits may be required as equipment density is increased.
- (c) A dedicated building ground, that is compliant with the EIA/TIA 607, should be installed by certified electrical contractors, into each closet for telephone equipment grounding.
- (d) Install high security single key dead bolt lock on equipment room door. Door will be equipped with an automatic door closer and a mechanical combination push-button lock.
- (e) Ceiling space above equipment room should be open and clear of major HVAC systems and duct work, including major motors, elevator motors, generators, or equipment that induces excessive EMI, and/or RFI to telecommunications equipment or systems.
- (b) Room temperature must be maintained at 75 degrees F db, +/-2 degrees and 60% RH (maximum) for summer, and 70 degrees F db, +/-2 degrees and 35% RH (minimum) for winter. When heat generating equipment is placed into the equipment room, it is essential to maintain environmental parameters.
- (g) Where no dedicated HVAC system is required for plenum air return buildings, there should be a minimum of 2 diffusers for fresh HVAC air intake, with a minimum of two return air vents, vented door and positive air flow maintained. Buildings without air return systems should provide clean air 24 hours a day, 7 days a week. Additionally, rooms without dedicated HVAC systems should have continuous air flow 24 hours a day.
- (h) Where EPA data and voice cables must pass through telecommunications closets not controlled by EPA or the U.S. government, mechanical protection must be provided. Thin wall ridged conduit will be sufficient for this requirement.
- (i) Flooring is vinyl tile. Carpet in equipment rooms is NOT acceptable.

11. MAIL/COPY/GENERAL STORAGE ROOM